

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE WILMINGTON TRUST)	
SECURITIES LITIGATION)	Master Civ. No. 10-990-SLR-SRF
)	(Consolidated Securities Class Action)
)	


**UNOPPOSED MOTION OF UNITED STATES OF AMERICA TO
INTERVENE AND MOTION FOR A STAY OF DISCOVERY**

Now Comes the United States of America, by and through its undersigned counsel, and respectfully moves (1) to intervene in the above-captioned matter pursuant to Rule 24 of the Federal Rules of Civil Procedure and (2) for a stay of discovery pending the completion of the related criminal matters.

For the reasons set forth more fully in the accompanying memorandum of law and *Ex Parte* Affidavit, the United States respectfully requests the Court to grant its motion to intervene and for a stay of discovery. A proposed order is attached.

Respectfully Submitted,

CHARLES M. OBERLY, III
United States Attorney
District of Delaware

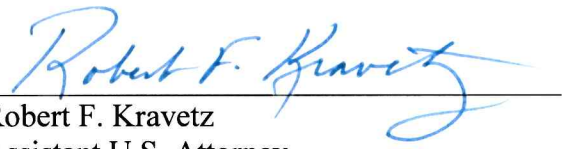


Robert F. Kravetz, Esq.
Lesley F. Wolf, Esq.
Assistant United States Attorneys

Dated: October 27, 2015

CERTIFICATION PURSUANT TO LOCAL RULE 7.1.1

Pursuant to Local Rule 7.1.1, Intervenor, the United States of America, has consulted with counsel for the Plaintiffs and Defendants. All parties consent to the United States' Motion to Intervene. Defendants Gibson, Harra, North, and Rakowski take no position with regard to the Motion for a Stay of Discovery while the remaining defendants consent to the United States' Motion for a Stay of Discovery. Counsel for Plaintiffs opposes the Motion for a Stay of Discovery.


Robert F. Kravetz
Assistant U.S. Attorney
District of Delaware

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ORDER

AND NOW, this ____ day of _____, 2015, upon
consideration of Intervenor United States of America's Unopposed Motion to Intervene and
Motion for a Stay of Discovery, IT IS HEREBY ORDERED that:

1. The Unopposed Motion to Intervene under Federal Rule of Civil Procedure 24 is GRANTED.
2. The Motion for a Stay of Discovery is GRANTED. All further fact discovery is stayed until resolution of the criminal matters, *United States v. Gibson, et al.* 15-23-RGA; *United States v. Terranova*, 13-39-GMS; and *United States v. Bailey*, 14-05-RGA.
3. The Stay shall not apply to any documents ordered to be produced in conjunction with the resolution of Plaintiffs' Motion to Compel the Production of Documents Withheld Based on the Bank Examination Privilege (D.I. 233) and the additional documents yet to be reviewed and produced by Wilmington Trust as set forth in Plaintiff's Status Report. (D.I. 408.)

By the Court: _____

Hon. Sue L. Robinson
United States District Judge